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December 21, 2015

Michelle Mullin, Project Manager
U.S. Environmental Protection Agency - Region 10
1200 Sixth Avenue, Suite 900, OCE-084
Seattle, WA 98101

Re: Rainier Commons, LLC – Old Rainier Brewery Exterior Paint Abatement Phase II Individual Phased Work Plan (IPWP) – Supplement No. 3 - for South Wall of Building 15 only

Dear Ms. Mullin:

Please accept, for your review and approval, this Supplement No. 3 to the Rainier Commons IPWP for Phase II of the exterior paint abatement project at the Rainier Commons campus. The IPWP for Phase II was submitted to EPA on February 24, 2015. Supplement No. 1 followed on March 25, 2015 transmitting Exhibit 15 to the plan and alerting EPA of the need to expedite the abatement of the south wall of Building 15 due to pending adjacent development that will shortly prevent all access to that wall. Supplement No. 2 was submitted to EPA on May 8, 2015 which included the particulars for including the south wall of Building 15 to the Phase II work. The current document, Supplement No. 3 addresses EPA's particular questions and requested for clarification and additional information for the south wall of Building 15 only.

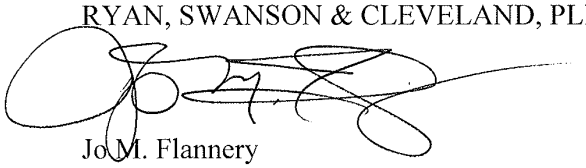
Attached hereto is a document listing the items that EPA requested of Rainier Commons for clarification, confirmation or additional information and Rainier Commons' responses thereto. A number of these items include additional particulate monitoring and site assessments that Rainier Commons has included in the pending Building 15 work as a further demonstration project regarding the work with the intent that future risk based approvals of subsequent portions of the Phase II work and additional phases of the work can proceed in reliance on this demonstration data, without the need to include it in each subsequent phase similar to the visual clearance criteria and substrate sampling.

Currently, based on contractor availability, the earliest start date for Building 15 is projected to be January 11, 2016. Other variables include coordination with the contractor performing work to the south of Building 15, weather conditions, and the availability of rental particulate monitoring equipment. The Rainier Commons Project Manager will keep you apprised of the target start date.

If you have further questions please contact our office or Rainier Commons' Project Manager as you continue your work toward approval of the Phase II work, and the interim approval for the south wall of Building 15. We look forward to the approval to commence the Building 15 portion of the Phase II work, at your earliest convenience.

Very truly yours,

RYAN, SWANSON & CLEVELAND, PLLC



Jo M. Flannery
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Enclosure
cc: Client
Alex Fidis, EPA Regional Counsel (via electronic copy with enclosures)
Mark Marcell, CGI (via electronic copy with enclosures)
Dave Leonard, NVL (via electronic copy with enclosures)

1193986.01

I. General Clarifications and Supplements for South Wall of Building 15 portion of Phase II Work.

1. **You mentioned that CGI has sub-contracted with a different blasting contractor. You expect blasting to last a couple of days, and hand grinding may take longer - total project time will be about 2 weeks.**

   This is accurate, with one caveat. For scheduling purposes, we are planning for a three week project. This will protect against any unforeseen difficulties during the work.

2. **You agreed to obtain some sticky floor mats to put in place for the spaces that are undergoing abatement, so that track-in is reduced.**

   This is correct. A sticky "walk off" mat will be provided in both levels of Building 15, to help reduce the possible incidence of track-in from outside sources.

3. **You mentioned that for Building 15 there are no metal parts that require chemical stripping or removal and disposal. The roof flashing is unpainted and new.**

   This is correct. During seismic upgrades performed in the past, the parapet and roof counterflashing was replaced with new, factory painted (brown) materials.

4. **We discussed the wall draping plan for interior walls. You explained that the sheeting is only 12 feet wide, so you will need to seal those with spray adhesive and duct tape, allowing for a 6 inch overlap. We also discussed using two layers, rather than one, of duct tape. We also discussed adding an additional, new layer of duct tape each day, and you agreed.**

   This is accurate, with one caveat regarding adding a new layer of duct tape every day. Both the poly critical barriers and the poly back-up draping will be visually inspected on a daily basis prior to the start of blasting operations. See further response to Comment 5, below.

5. **We will need for you to demonstrate the integrity of the poly-sheeting in providing containment. For the scaffolding containment structure, you demonstrate this continuously with a manometer. Please provide a methodology for demonstrating integrity of the interior polysheeting daily.**

   The second sentence of paragraph three, page 5, Exhibit 6, of the Individual Phased Work Plan Phase Two (IPWP 2) shall be revised as follows (revisions in italics):

   Interior *surfaces* protection will consist of two layers of 6 mil reinforced poly, *applied directly to interior wall surfaces,* secured to the *floor and ceiling* with duct tape and spray adhesive (as needed). *These interior critical barriers constitute the interior extent of the NPE. Upon application of negative air to the NPE, these poly layers will be "sucked in" or cling to the interior wall surfaces. Prior to blasting, a daily, visual inspection will be made of all critical barriers, to ensure seal integrity. If, during the course of this inspection, any delamination of the duct tape from any surface is noted, the area will be immediately re-sealed with another layer of*

duct tape. Verification photographs, as well as an entry in the Daily Field Notes will document this inspection.

The following revisions shall be added after the last sentence of paragraph four, page 5, Exhibit 6, IPWP 2:

The integrity of this additional back-up draping will be verified during the visual inspection described above, and included in photo and Field Note documentation.

6. **It should be noted that EPA requires daily inspection, polysheeting, and air monitoring of all interior spaces opposite the exterior containment structure until the containment structure is fully removed and abatement is complete.**

   A new paragraph, following paragraph four, page 5, Exhibit 6, IPWP 2 shall read:

   Daily visual inspections, photo and Field Note documentation, and particulate monitoring will continue until the NPE is cleared for removal, subsequent to post abatement wipe sampling in the space between the interior boundary of the NPE and the poly back-up draping.

7. **To ensure protection of human health - any inspection and/or cleaning of abatement areas, interior or exterior, shall be done under the assumption that it contains PCBs - only properly trained employees with adequate PPE shall conduct inspection, sampling, tear down and cleaning of interior or exterior spaces.**

   As described in the Rainier Commons Work Plan, dated March 25, 2013 and revised July 25, 2013, on page 13, under the heading "Warning Signs", all entrances into the containment area will be clearly marked with the appropriate warning sign. Although the area inside the floor-to-ceiling back-up draping is outside the NPE, its entrance will also serve as the demarcation point for the same warning signage. This requirement is restated in IPWP 2, Exhibit 6, page 5, paragraph 5. The area between the interior surface protection and the back-up draping will not require full PPE but will be inspected by certified personnel and all such personnel will don dust mask, booties and gloves while in that area.

8. **At this time I cannot approve elimination of substrate sampling.**

   The substrate at issue on the south wall of Building 15 is all brick, which has already been cleared, by prior demonstration work, from the need for additional substrate sampling. We understand that EPA may still be reviewing substrate sampling results for Phase I work on the concrete and sandstone. We can confirm here that the underlying substrate of the construction material used on the south elevation of Building 15 consists of brick and mortar and no other type of substrate. A visual acceptance standard for this substrate was previously approved in the EPA's Risk Based Disposal Approval, dated December 18, 2013. In the interests of time, we would understand if EPA wished to review this item, reserve it in your Building 15 approval and then issue an addendum to your Building 15 approval as to the waiver of the need for brick substrate sampling, following any additional verification on this items that EPA may need.

9. **You need to ensure that the Reporting Limit, or quantifiable limit the lab can provide, is at least 1/5 the Action Level. So, for PCBs in sediments where the Action Level is 1ppm, the Reporting Limit needs to be at least 0.2 ppm.**

   IPWP 2, Exhibit 5 is incorporated for abatement work performed on the south elevation of Building 15, by reference, with the following revisions to page 4, section titled "Maximum Concentration Level (MCL)":

   Delete the sentence which reads: "Reporting Limits shall correspond to these levels."

   Replace with: *For aqueous sampling, achieving a Reporting Level of 0.033 ug/L is dependent on being able to collect a 2 liter aqueous sample. If we are unable to obtain a 2 liter sample, we will request the lowest reporting limit be achieved with the sample submitted.*

   For sediment sampling, achieving a Reporting Level of 0.33 mg/kg is dependent on being able to collect a sample that would weigh 10 grams when dry. The dry weight of a wet sample is determined at the lab by measuring the moisture content and doing a calculation. As an example, a recent sediment sample contained 93.9% moisture by weight, so one can understand we need to be sure we collect a substantial sample amount. If we are unable to obtain a 10 grams when dry sample, we will request the lowest reporting limit be achieved with the sample submitted.

10. **You mentioned that generated debris will be collected daily and stored underneath of the lowest level of the scaffolding containment structure. Please provide all details of this daily cleaning and storage procedure. I will need to make a finding of no unreasonable risk for storage in anything other than a drum. Please provide support that your proposal does not provide unreasonable risk.**

    Upon completion of daily blasting activities, all affected scaffolding planks will be broom cleaned. Blasting debris accumulating at the floor of the NPE will be collected and bagged in "contractor" 3 mil garbage bags. These individual bags are then place in a one cubic yard, Department of Transportation approved supersack (DOT SP 12750). These supersack containers are manufactured by QueststarUSA, specification number ZNEDC GALAXYO. These containers are constructed of a tight-weave plastic material with reinforced sides and a double-overlapping, tie-down top. The containers are double walled. The interior of the containers are lined with an additional 6 mil plastic bag. These supersack containers are approved to handle up to 3,000 pounds. The supersack waste containers will remain inside the further protection of the containment structure, until such time as they are removed for appropriate disposal by the hazardous waste company. Upon receiving clearance for containment break-down, these containers will be loaded directly onto transportation trucks for disposal.

11. **The SPCC does not detail how spills or releases will be cleaned up. A spill or release is not limited only to liquids, but includes dry debris such as blast media co-mingled with PCB contaminated paint. Any spill or release shall be managed in accordance with the Spill Cleanup Policy in 40 CFR 761.120 through 761.135 http://www.ecfr.gov/cgi-bin/text-idx?SID=6b2b0dcbd5a091ed305b9d9beb99afc8&mc=true&node=sp40.31.761.g&rgn=div6**

This Policy requires immediate action to clean it up and specifies clean-up procedures such as double-wash rinse, and collection of wipe samples for verification sampling.

The following revisions to Exhibit 7, IPWP 2 are incorporated by reference:

Section titled "Applicable Rules and Regulations" shall include the following reference:

40 CFR 761.120 through 135 PCB Spill Cleanup Policy

At the end of the Section titled "Spill Containment" the following paragraphs are added:

Upon detection of a PCB spill, the spill area, including a three foot buffer beyond the spill, will be cordoned off with placards and/or caution tape. Cleanup operations will proceed as quickly as practicable, but in no case later than 24 hours after spill detection.

Spill cleanup will follow a double wash/rinse protocol, defined in 761.123, utilizing a solvent in which PCBs are readily soluble; such as xylene, toluene, kerosene, or isopropyl alcohol. Uncontaminated cleaning supplies will be utilized for each wash/rinse cycle.

Final spill decontamination standards shall meet the criteria of 761.125(c)(4), for unrestricted residential/commercial surfaces, as tested utilizing standard 100 sq/cm wipe tests.

Documentation of spill cleanup activities shall conform with 761.125(c)(5).

11. Exhibit 8 has references to asbestos hazards throughout. The document should refer to PCB hazards instead, so that employees are aware of the risk they are working in. The respiratory protection program is asbestos specific, but should be updated to be specific to PCB and copper slag dust.

Exhibit 8 is the General Health and Safety Plan for CGI. Exhibit 6 contains the Site Specific Safety Plan used by CGI. The site specific health and safety plan addresses PCBs. The site specific health plan shall be updated. Exhibit 6, page 11, following the third paragraph is changed by reference to include the following:

All CGI field personnel are hereby informed of the risks which may be associated with this project. The removal of dried, applied exterior paint may generate dust containing PCBs. PCBs have been linked to cancer, as well as other potential health effects. Use of all protective gear described in this plan, as well as strict adherence to all safety instructions listed, is a job requirement.

Exhibit 6, page 11, Section titled "Respiratory Protection Program" is changed by reference to include the following new paragraph:

Paint removal operations generate large amounts of dust and debris. This dust/debris may contain PCBs, as well as the actual blasting medium. Blasting medium used on this project is Copper Slag. Exhibit 9 contains the MSDS for copper slag. A properly fitted, full face

respirator will be worn by all personnel entering the NPE. Respirator filters will be changed regularly to ensure proper operation.

12. **Exhibit 9 contains a figure that shows the containment structures, location of the NAMs and decon/equipment load out areas, and location of roof inlets with protection plans. Please provide a similar diagram for Building 15.**

    The attached "Supplement to Exhibit 9 Site Plan" is incorporated by reference.

13. **Please provide an update to Exhibit 10 for Building 15. Especially a plan for parking lot drain inlet protection adjacent to enclosure.**

    Building 15 is located adjacent to the existing manholes and catch basins shown on the diagram in Exhibit 10. No additional catch basins are affected by this portion of the abatement project. Exhibit 10 is modified by reference to include the south elevation of Building 15.

II. Air Monitoring

1. **Building 15 has one metal vent on the side. It is blocked on the inside by sheet metal. You agreed to seal the vent, and seismic bolts, and the door, and any other point of ingress on the inside of the building. These will be individually sealed, in addition to the poly-sheeting across the entire wall surface.**

   After further site review with CGI, it was determined that the most efficient and comprehensive protection for these multiple locations is to treat the entire interior wall surface with "critical barrier" protection as described in item 5, above.

2. **I had a discussion with Chris about air monitoring today. Since dust is mobile within the entirety of the containment structure, and not just at the site of blasting, air monitoring for dust particulate matter is necessary inside the building in all locations that are opposite the active containment structure. For building 15, the entire south wall is proposed to be wrapped in containment. Given this, air monitoring is necessary inside the building on both floors during all abatement activity. The second floor has 7 rooms along the wall that will be blasted. Each room will need two air monitors. One air monitor will be between the wall and the sheeting- to determine if any dust is entering the building. One air monitor will be outside the sheeting, to serve as an indicator should dust enter the building and the sheeting fail to provide effective control. The first floor appears to be one large open space. It will need four air monitors inside the sheeting and four outside, for a total of 8 monitors on the first floor. The total number of air monitoring locations is 22 inside the building.**

   Our discussion regarding particulate monitoring and further demonstration data collection is on-going. Please refer to email dated December 11, 2015, for addition information regarding particulate monitoring. We have also developed a decision tree for action guidance if any elevated particulate conditions are detected. Copy attached.

3. **Outside the building you will need one air monitor upwind to record the background particulate readings before and during abatement. You will also need two air monitors positioned downwind of the containment structure, for a total of 4 air monitors outside.**

   Please refer to email dated December 11, 2015, for additional and modified information regarding particulate monitoring.

4. **We are thinking that since this building is unoccupied, we will likely go with a Not To Exceed (NTE) background criteria, rather than the previously established numeric criteria, for building 15 only. This will need to be based on background readings that you take over several days prior to blasting activities. Each monitoring location will require its own background data collection. You will collect the background readings by placing the machines where they will be during blasting activity, and running them during the hours that blasting will occur. This should be completed over a minimum of three days. Each location shall then be analyzed for average particulate concentration over the duration of monitoring, as well as variability around the mean. This should be submitted to EPA at least 2 weeks before blasting begins so we can determine the appropriate background level NTE.**

   Please refer to email dated December 18, 2015 for initial data relating to this request. Additional data will follow under separate cover per your request.

5. **Question- you stated that your machines have an alarm- is it audible AND visual? Do the alarms go off only at the location of the machine, or is it possible to have the data and alarm feature remotely sent to you? For future phases, we are leaning towards needing remote capabilities in the monitoring equipment.**

   The EPAM 5000 is equipped with an audio alarm, only. When considering utilizing the alarm feature, careful consideration should be given to the alarm threshold selected. Since our decision criteria is based on a Time Weighted Average (TWA), we can expect to detect particulates up to as many as three standard deviations higher than the TWA, and still fall within statistically expected "norms".

   III. Storm and Sanitary Sewer Monitoring:

1. **You mentioned that the catch basin sampling plan will not differ from that presented in the workplan for buildings 6-10**

   IPWP 2, Exhibit 5 is incorporated by reference for the abatement work performed on the south elevation of Building 15, with the addition of item I. 9. regarding sensitivity and reporting limits above.

2. **Your workplan states that the roof drains and inlets are not near the location of blasting. You agreed to submit photographs demonstrating this. The roof inlets are capped and also have filter fabric in place already.**

The attached photographs depict the two roof drain locations, which are outside the NPE for Building 15's south elevation abatement work.

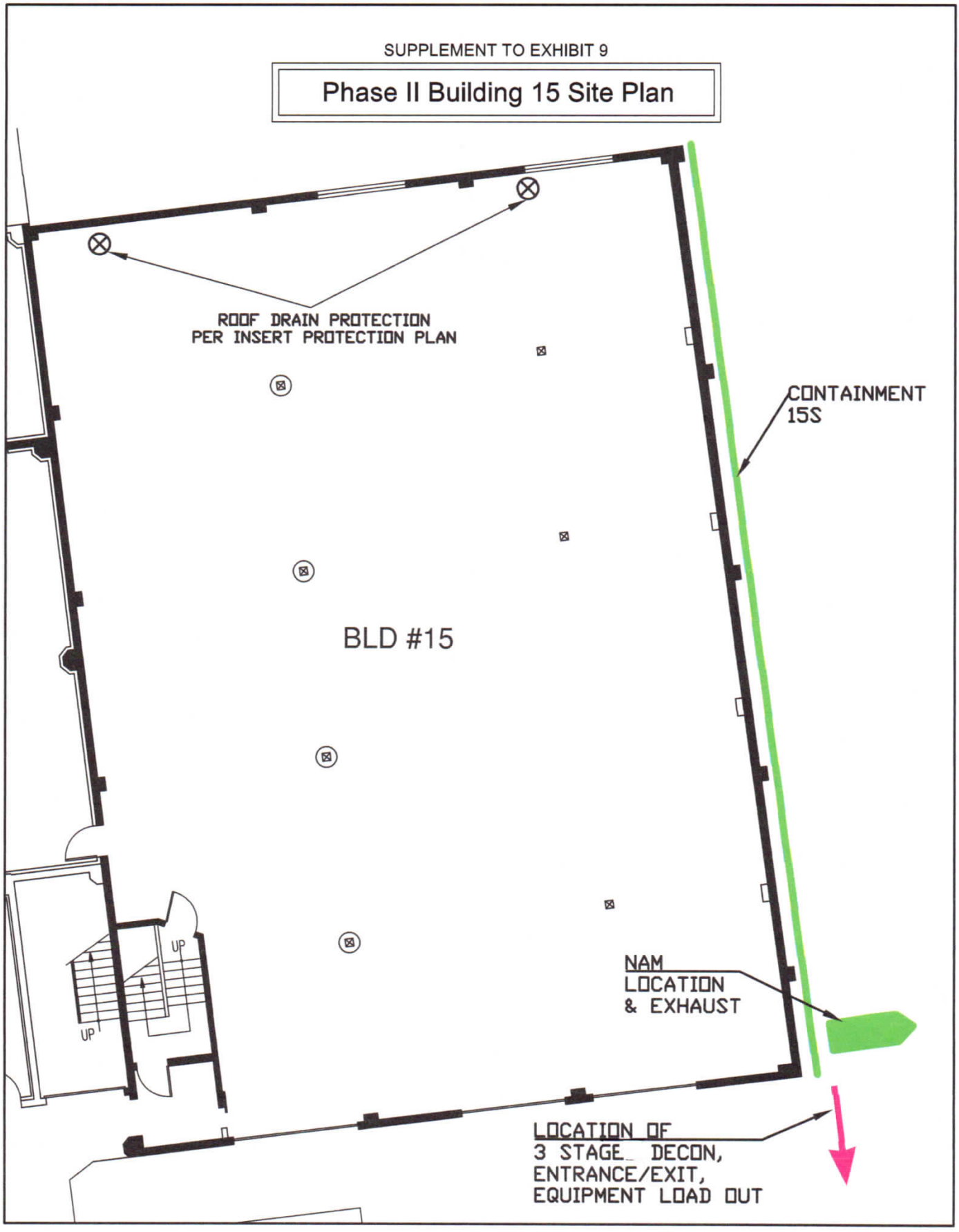
IV. Wipe Sampling:

1. **I need to discuss this with Lon Kissinger, our risk assessor. I plan to do this in the next couple of weeks. I may end up writing an approval for the rest of your work plan, and then write an amendment for the wipe sampling component later. We will see what will be most efficient.**

Please refer to email dated December 11, 2015, for wipe sampling locations regarding Building 15.

SUPPLEMENT TO EXHIBIT 9

Phase II Building 15 Site Plan



DECISION TREE

1) Install Double Layer Critical Barrier Poly Along Blast Wall
    - Visually Inspect Prior to and During Blasting
        - Delamination Detected?
            - Yes – Re-seal with additional duct tape and/or spray adhesive
            - No – No Actions

2) Install Single Layer Secondary Containment Poly Two Feet Beyond Critical Layer
    - Visually Inspect Prior to and During Blasting
        - Delamination Detected?
            - Yes – Re-seal with additional duct tape and/or spray adhesive
            - No – No Actions

3) Collect Pre-Abatement Wipe Samples on Each Floor
    - Five Samples Between Boundary of NPE and Secondary Containment
    - Three Samples Located Towards the North Sector of the Building

4) Position and Run Particulate Monitor at Center of Space Created by NPE Boundary and Secondary Containment (box fans on each end of space, blowing towards monitor)
    - Audible Alarm Set
    - Periodically observed during blasting operations

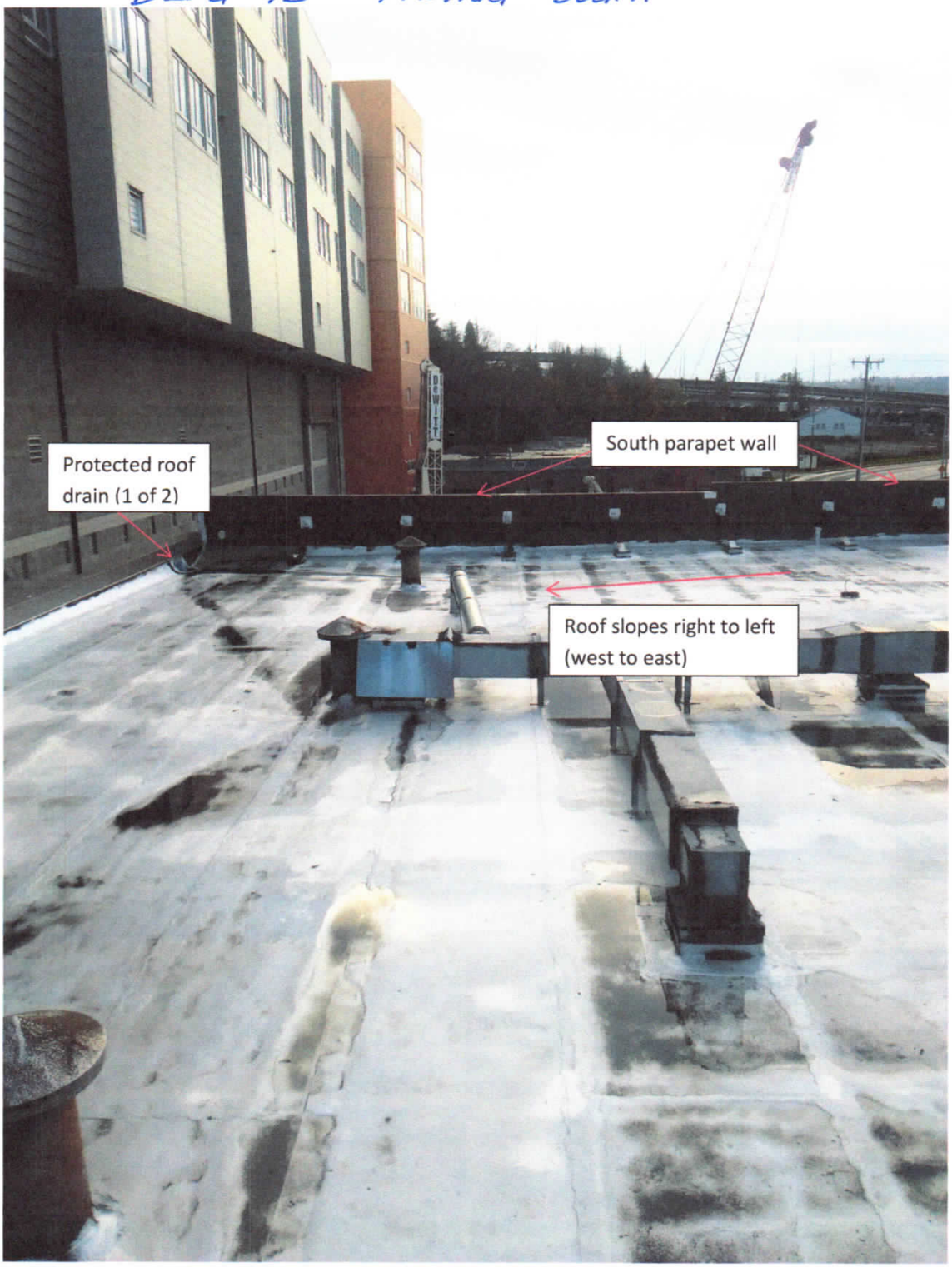
5) Upon Completion of Blasting for the Day, Download and Analyze Monitor Information
    - Within Acceptable Limits? – No Actions
    - Exceeds Acceptable Limits? - Yes
        - Halt Further Blasting Activities
        - Perform Detailed Examination of NPE Integrity
        - Submit Collection Filter to NVL for Analysis -Item 6
        - Notify EPA

6) NVL Lab Perform Analysis of Submitted Sample to Detect the Presence of PCBs
    - Sample Contains PCBs?
        - No – No Actions
        - Yes – Collect Wipe Samples to the North of Secondary Containment Poly -Item 7
            - Locate and eliminate source of PCB entry
            - Perform Regulatory Clearance Cleaning per 40 CFR 761.120 through 135

7) NVL Perform Analysis of Collected Wipe Samples
    - Sample Contains PCBs?
    - No – No Actions
    - Yes – Collect Wipe Samples from Northern Sector of Building 15
        - Locate and eliminate source of PCB entry
        - Perform Regulatory Clearance Cleaning per 40 CFR 761.120 through 135

8) Upon Completion of All Blasting Activities and Prior to Removal of Any Poly Layers
    - Collect Wipe Samples adjacent to locations identified in Item 3
        - Samples Contain PCBs?
        - No – NPE cleared for removal/disposal
        - Yes - Regulatory Clearance Cleaning per 40 CFR 761.120 through 135
            - Retest to verify efficacy

BLDG 15 - FACING SOUTH



BLDG 15 - EAST ELEVATION

BLDG 15 LEVEL 200 SOUTHWEST QUADRANT